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Hastings College Social Research Center

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Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

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MM Docket No. 93-48

The following is our response to the testimony presented at the FCC en banc hearing on children's television (MM Docket No. 93-48). We both testified at that hearing on the third panel: The Economics of Providing Educational and Informational Programming for Children.

We believe that for the FCC to hold broadcasters accountable for fulfilling the requirements of the Children's Television Act of 1990 they need to implement two rules.

1. Require broadcasters to file a statement demonstrating: A) programming goals and objectives for meeting the educational and informational needs of children that can be met by television. These goals and objectives would be derived from annual community needs assessment studies; and, B) an evaluation of the educational and instructional content of their children's programming relative to those goals and objectives.

The needs assessment and the evaluation studies should be accomplished using focus group interviews conducted by qualified, independent researchers. Broadcasters in a given market area could share the results of any study done in their market area. Focus group participants would be representative of the diversity in social class, race/ethnicity, sex and age in the market area.

2. Require that broadcasters air children's programming (which satisfies the requirements stated above for educational and informational children's programming) to a significant potential audience.

A significant potential audience can be defined as a cumulative weekly HUT (percent of Households Using Television) of 130 for each thirty-minutes of programming. For example, if a broadcaster airs a one hour program at 6:00 a.m., Monday through Friday, where the HUT is 15 it will meet requirements because the total weekly HUT would be 150 (2 half hour episodes x 5 days x 15 HUT = 150). If that broadcaster airs a half hour program at 4:00 p.m. where the HUT is 33, the total weekly HUT would be 165 (1 half hour episode x 5 days x 33 HUT = 165) and meet the requirement. Airing a one hour children's program as a prime time special where the HUT is 67 would give a total weekly HUT of 134 (2 half hour episodes x 1 day x 67 HUT = 134) and again meet the requirement.

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Defining "significant potential audience" in terms of a cumulative HUT instead of an hourly requirement per day in a specific time slot gives the broadcaster much more flexibility and motivates the broadcaster to maximize the quality of the programming to attract an audience. Once broadcasters are required to demonstrate they are meeting children's needs and are committed to airing children's programming to a significant potential audience they will find a way to gather their audience. That is what they do best.

Discussion.

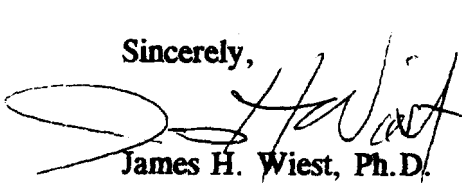
At the hearing we heard much discussion about the relative educational vs. entertainment value of any given program, the expense of producing entertaining children's programming, and the problem of categorizing a program as educational if it is more than fifty percent entertainment.

In response we argue that to confound these two separate dimensions of children's programming in this manner creates a false dilemma. The real issue is how to determine the extent to which television programming meets specified educational and instructional needs of children. Determining and meeting these needs can be done cost-effectively in individual markets through established social science techniques such as focus group interviews. Also, the entertainment value of a program is not an issue. What broadcasters and advocates for better children's programming want is for children to watch good programming, i.e., ratings. To enhance ratings programming can be compelling, interesting, meaningful, familiar or relevant, as well as entertaining. For example, our research indicates story-telling that involves children rivets children's attention and results in extremely high factual recall. Expensive special effects are not necessary to retain children's attention.

It is obvious from the testimony received at the hearing that insufficient air time is given to good children's programming and the time slots for that programming do not correspond to children's viewing habits. Even though some broadcasters testified that children's educational programming has increased since 1990, no one has offered any evidence that any of this programming has met any children's educational or informational needs. Further, it is obvious the broadcasting industry requires a fixed standard specifying a minimum amount, and a time slot, or a minimum cumulative HUT for children's programming since pressure from Congress and the FCC has not produced significant results. Even if sufficient air time is made available it does little good unless it is at a time children usually watch, or better yet, at a time when children and parents can watch together.

Our own research indicates the public is deeply troubled and frustrated with the programming available to their children. In exchange for their use of the public airways broadcasters must be held to a higher standard of service to children.

Sincerely,



James H. Wiest, Ph.D.



Ronald D. Davis, Ed.D.

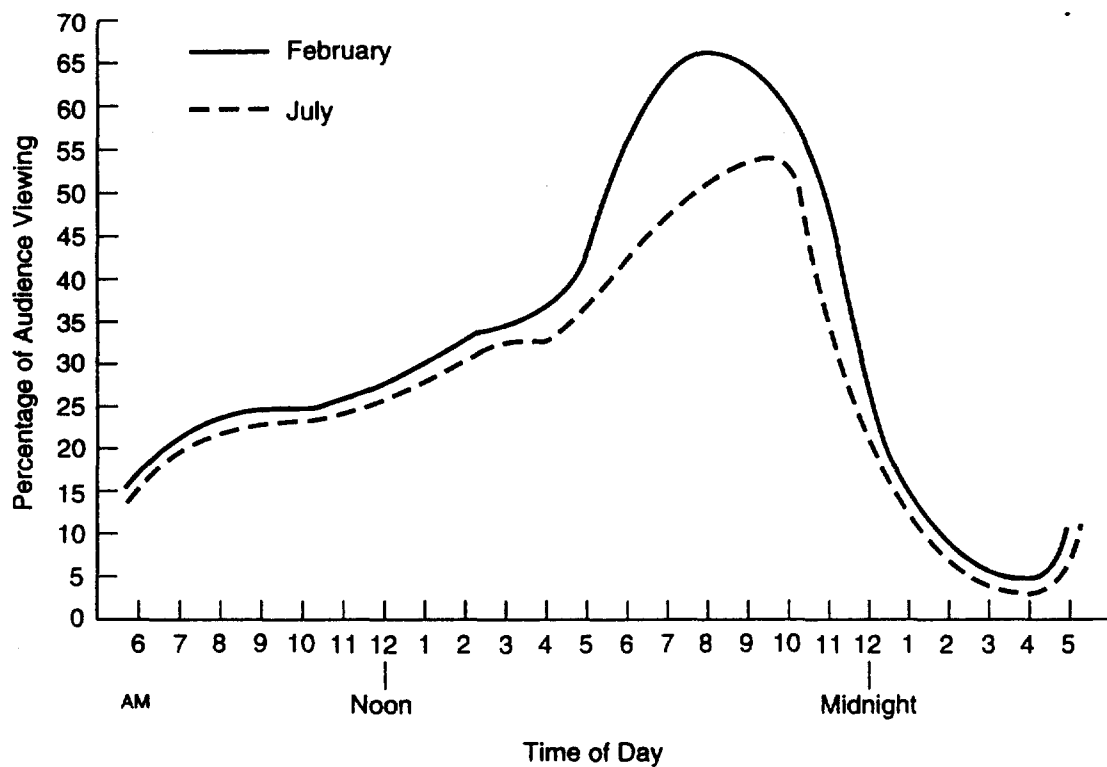


FIGURE 11-4 Viewing by time of day and season of the year: percentage of potential audience viewing television. (Used by permission of Nielsen Media Research.)

Source: Electronic Media Programming by Raymond Carroll & Donald Davis, McGraw-Hill, 1993